

KATTEN MUCHIN ROSENMAN LLP
575 Madison Avenue
New York, New York 10022
(212) 940-8800
Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,)	
Plaintiff-Applicant,)	Adv. Pro. No. 08-01789 (SMB)
v.)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	SIPA Liquidation
Defendant.)	(Substantively Consolidated)
In re:)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	
Debtor.)	
IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff)	
Plaintiff,)	Adv. Pro. No. 12-01699 (SMB)
v.)	
ROYAL BANK OF CANADA; GUERNROY LIMITED; ROYAL BANK OF CANADA (CHANNEL ISLANDS) LIMITED; ROYAL BANK OF CANADA TRUST COMPANY (JERSEY) LIMITED; ROYAL BANK OF CANADA (ASIA) LIMITED; ROYAL BANK OF CANADA (SUISSE) S.A.; RBC DOMINION SECURITIES INC.; AND RBC ALTERNATIVE ASSETS, L.P.,)	
Defendants)	

**DECLARATION OF MARK T. CIANI
IN SUPPORT OF DEFENDANTS' MOTION TO STAY**

I, Mark T. Ciani, declare the following:

1. I am a partner at Katten Muchin Rosenman, LLP, counsel for Defendants Royal Bank of Canada; Guernroy Limited; Royal Bank of Canada (Channel Islands) Limited; Royal Bank of Canada Trust Company (Jersey) Limited; Royal Bank of Canada Singapore Branch, as successor to Royal Bank of Canada (Asia) Limited; Banque SYZ, as successor to Royal Bank of Canada (Suisse) S.A.; RBC Dominion Securities Inc.; and RBC Alternative Assets, L.P. (collectively, "RBC"), and I am admitted to practice before this Court. I am familiar with the matters stated herein based on personal knowledge or a review of files in the possession of my firm. I make this declaration in support of RBC's Motion to Stay.

2. On or about July 24, 2009, the Trustee served Royal Bank of Canada with a Subpoena for Rule 2004 Examination (the "Rule 2004 Subpoena"), a true and correct copy of which is attached hereto as Exhibit A.

3. On or about September 30, 2009, my firm served responses and objections to the Rule 2004 Subpoena, a true and correct copy of which is attached hereto as Exhibit B, and produced, among other things, certain documents relating to certain RBC entities' due diligence of, and marketing materials related to, any funds holding an account with Bernie L. Madoff Investment Securities, Inc. ("BLMIS"), including Fairfield Sentry, Fairfield Sigma, Kingate Global Fund, Ltd., Rye Prime Fund, Rye Broad Market, and Rye Portfolio Limited.

4. In support of RBC's Motion to Stay, a Proposed Order is attached hereto as Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 24, 2020 in New York, New York.

DocuSigned by:

Mark T. Ciani

C42DCA0030BA42D...

Mark T. Ciani